

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
THIS DOCUMENT RELATES TO THE CASES ON THE EXHIBIT ATTACHED HERETO	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

JOINT MOTION TO DISMISS WITH PREJUDICE

Plaintiffs, whose cases are listed on the attached Exhibit A, and Defendants, Johnson & Johnson, Ethicon, Inc., and/or Ethicon LLC (collectively, the “Ethicon Defendants”), jointly move to dismiss with prejudice all claims against the Ethicon Defendants in these cases which were, or could have been, asserted, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii). Each party shall bear her or its own costs.

Respectfully submitted,

/s/ Caroline Underwood Hollingsworth
Caroline Underwood Hollingsworth
P. O. Box 11310
Birmingham, AL 35202
205.326.3336
caroline@hglawfirm.com
Counsel for Plaintiffs

/s/ William M. Gage
William M. Gage (MS Bar #8691)
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4561
william.gage@butlersnow.com

/s/ Susan M. Robinson
Susan M. Robinson (W. Va. Bar #5169)
Thomas Combs & Spann PLLC
300 Summers Street
Suite 1380 (25301)
P.O. Box 3824
Charleston, WV 24338
(304) 414-1800
srobinson@tcspllc.com

Counsel for the Ethicon Defendants

CERTIFICATE OF SERVICE

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

EXHIBIT A

<i>Case Number</i>	<i>Case Style</i>
2:13-cv-24989	Aldridge et al v. Ethicon, Inc. et al
2:14-cv-00576	Cohen et al v. Ethicon, Inc. et al
2:14-cv-13914	Herglotz et al v. Ethicon, Inc. et al
2:13-cv-32582	Herrick v. Ethicon, Inc. et al
2:13-cv-28432	Lowe et al v. Ethicon, Inc. et al
2:13-cv-32581	Mauk v. Ethicon, Inc. et al
2:14-cv-13945	Peterson v. Ethicon, Inc. et al
2:13-cv-33341	Smith et al v. Ethicon, Inc. et al
2:13-cv-28415	West v. Ethicon, Inc. et al